IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

BABY DOE, *et al.*,	
Plaintiffs,	CIVIL NO: 3:22-cv-00049-NKM-JCH
-v.-	
JOSHUA MAST, *et al.*,	
Defendants,	

PLAINTIFFS' SECOND REQUESTS FOR ADMISSION
TO DEFENDANT JOSHUA MAST

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure Plaintiffs hereby serve this First Set of Requests for Admission ("RFAs") on Defendant Joshua Mast. In accordance with Rule 36, Plaintiffs direct Defendant Joshua Mast to respond separately and fully, in writing and under oath, to the RFAs within thirty (30) days of the date of service hereof.

DEFINITIONS

1. The term "You" or "Your" refers to Defendant Joshua Mast.

2. The term "Litigation Relating to Baby Doe" refers to *In the Matter of "Baby [Doe]"*, Case No. JJ004656-01-00 in the Juvenile and Domestic Relations Court of Fluvanna County; *In the Matter of "Baby [Doe]"*, Case No. 19CA12, in the Circuit Court of Fluvanna County; *A.A. and F.A. v. J.M. and S.M.*, Case No. CL22000186-00 in the Circuit Court of Fluvanna County; *Baby L et al v. Esper et al*, Case No. 3:20-cv-00009 (W.D. Va.); and/or the above-captioned instant matter.

3. The terms "Regarding" and "Relating to" means concerning, respecting, containing, recording, discussing, mentioning, noting, summarizing, referring to, commenting upon, describing, digesting, reporting, listing, analyzing or studying.

4. The term "Communication" and "Communications" shall refer to emails, text messages, instant messages, and/or messages sent or received via any type of electronic messaging application.

INSTRUCTIONS

1. Respond to each RFA separately.

2. In response to each RFA, specifically admit the matter set forth in the RFA, deny the matter set forth in the RFA, or set forth in detail the reasons why You cannot truthfully admit or deny the matter set forth in the RFA.

3. If You deny an RFA or part of an RFA, Your denial must fairly respond to the substance of the RFA. When good faith requires that You qualify an answer or deny only a part of the matter for which an admission is requested, specify so much of it as is admitted and qualify or deny the remainder.

4. Where an RFA calls for an answer in more than one part, clearly and separately set forth each part of Your response.

5. Each RFA should be construed independently and without reference to any other RFA unless otherwise indicated.

6. If You find the meaning of any term in an RFA to be vague or ambiguous, assume a reasonable meaning, state what that assumed meaning is, and answer the RFA on the basis of that assumed meaning.

7. To the extent that You believe that any of the RFAs are objectionable, answer so much of each RFA that is not objected to and separately state the portion of each RFA to which You object and the grounds for Your objection.

REQUESTS FOR ADMISSION

jkmast@liberty.edu

1. Admit that, using the jkmast@liberty.edu address, You have sent to or received from Stephanie Mast Communications Regarding Litigation Relating to Baby Doe.

2. Admit that, using the jkmast@liberty.edu address, You have sent to or received from Richard Mast Communications Regarding Litigation Relating to Baby Doe.

3. Admit that, using the jkmast@liberty.edu address, You have sent to or received from dschmid@lc.org Communications Regarding Baby Doe.

4. Admit that, using the jkmast@liberty.edu address, You have sent to or received from daniel@lc.org Communications Regarding Baby Doe.

5. Admit that, using the jkmast@liberty.edu address, You have sent to or received from Mat@lc.org Communications Regarding Baby Doe.

6. Admit that, using the jkmast@liberty.edu address, You have sent to or received from MStaver@lc.org Communications Regarding Baby Doe.

7. Admit that, using the jkmast@liberty.edu address, You have sent to or received from Jona@lc.org Communications Regarding Baby Doe.

8. Admit that, using the jkmast@liberty.edu address, You have sent to or received from Mary@lc.org Communications Regarding Baby Doe.

9. Admit that, using the jkmast@liberty.edu address, You have sent to or received from JAlexandre@lc.org Communications Regarding Baby Doe.

10. Admit that, using the jkmast@liberty.edu address, You have sent to or received from rena@lc.org Communications Regarding Baby Doe.

11. Admit that, using the jkmast@liberty.edu address, You have sent to or received from RMast@lc.org Communications Regarding Baby Doe.

12. Admit that, using the jkmast@liberty.edu address, You have sent to or received from RLMast@liberty.edu Communications Regarding Baby Doe.

13. Admit that, using the jkmast@liberty.edu address, You have sent to or received from hwbradburn@liberty.edu Communications Regarding Baby Doe.

14. Admit that, using the jkmast@liberty.edu address, You have sent to or received from tnoonan1@liberty.edu Communications Regarding Baby Doe.

15. Admit that, using the jkmast@liberty.edu address, You have sent to or received from rlindevaldsen@liberty.edu Communications Regarding Baby Doe.

16. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cdunbar_GEV@liberty.edu Communications Regarding Baby Doe.

17. Admit that, using the jkmast@liberty.edu address, You have sent to or received from RLMast@protonmail.com Communications Regarding Baby Doe.

18. Admit that, using the jkmast@liberty.edu address, You have sent to or received from richard.l.mast.jr@gmail.com Communications Regarding Baby Doe.

19. Admit that, using the jkmast@liberty.edu address, You have sent to or received from hannonwright@gmail.com Communications Regarding Baby Doe.

20. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cynthianolandunbar@gmail.com Communications Regarding Baby Doe.

21. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cynthia@globaleducationadventures.com Communications Regarding Baby Doe.

22. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cynthia@globaleducationalventures.com Communications Regarding Baby Doe.

23. Admit that, using the jkmast@liberty.edu address, You have sent to or received from rachel@poarchlaw.com Communications Regarding Baby Doe.

24. Admit that, using the jkmast@liberty.edu address, You have sent to or received from MMcAlister@childparentrights.org Communications Regarding Baby Doe.

25. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cdunbar2@GEV.liberty.edu Communications Regarding Baby Doe.

26. Admit that, using the jkmast@liberty.edu address, You have sent to or received from cdunbar2.GEV@liberty.edu Communications Regarding Baby Doe.

Joshua.k.mast1.mil@socom.mil

27. Admit that, using the Joshua.k.mast1.mil@socom.mil address, You have sent to or received from Stephanie Mast Communications Regarding Litigation Relating to Baby Doe.

28. Admit that, using the Joshua.k.mast1.mil@socom.mil address, You have sent to or received from Richard Mast Communications Regarding Litigation Relating to Baby Doe.

Joshua.k.mast1.mil@mail.mil

29. Admit that, using the Joshua.k.mast.mil@mail.mil address, You have sent to or received from Stephanie Mast Communications Regarding Litigation Relating to Baby Doe.

30. Admit that, using the Joshua.k.mast.mil@mail.mil address, You have sent to or received from Richard Mast Communications Regarding Litigation Relating to Baby Doe.

Joshua.k.mast1.mil@mail.smil.mil

31. Admit that, using the Joshua.k.mast.mil@mail.smil.mil address, You have sent to or received from Stephanie Mast Communications Regarding Litigation Relating to Baby Doe.

32. Admit that, using the Joshua.k.mast.mil@mail.smil.mil address, You have sent to or received from Richard Mast Communications Regarding Litigation Relating to Baby Doe.

Signal

33. Admit that You have used the messaging application Signal to communicate with others Regarding Litigation Relating to Baby Doe .

34. Admit that You have not retained all messages Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application Signal.

35. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application Signal.

36. Admit that, on or after September 2, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application Signal.

37. Admit that, at any point since December 8, 2021, Your Signal account was set to auto-delete messages sent or received by You.

38. Admit that, between December 8, 2021 and September 1, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application Signal, was deleted by an auto-delete setting.

39. Admit that, on or after September 2, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application Signal, was deleted by an auto-delete setting.

WhatsApp

40. Admit that You have used the messaging application WhatsApp to communicate with others Regarding Litigation Relating to Baby Doe.

41. Admit that You have not retained all messages Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application WhatsApp.

42. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application WhatsApp.

43. Admit that, on or after September 2, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application WhatsApp.

44. Admit that, at any point since December 8, 2021, Your WhatsApp account was set to auto-delete messages sent or received by You.

45. Admit that, between December 8, 2021 and September 1, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application WhatsApp, was deleted by an auto-delete setting.

46. Admit that, on or after September 2, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using the messaging application WhatsApp, was deleted by an auto-delete setting.

Other Messaging Applications

47. Admit that You have used a text or instant messaging application other than Signal and/or WhatsApp to communicate with others Regarding Litigation Relating to Baby Doe.

48. Admit that You have not retained all messages Regarding Litigation Relating to Baby Doe that You sent or received using a text or instant messaging application other than Signal and/or WhatsApp.

49. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using a text or instant messaging application other than Signal and/or WhatsApp.

50. Admit that, on or after September 2, 2022, You deleted at least one message Regarding Litigation Relating to Baby Doe that You sent or received using a text or instant messaging application other than Signal and/or WhatsApp.

51. Admit that, at any point since December 8, 2021, Your account on a text or instant messaging application other than Signal and/or WhatsApp was set to auto-delete messages sent or received by You.

52. Admit that, between December 8, 2021 and September 1, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using a text or instant messaging application other than Signal and/or WhatsApp, was deleted by an auto-delete setting.

53. Admit that, on or after September 2, 2022, at least one message Regarding Litigation Relating to Baby Doe that You sent or received using a text or instant messaging application other than Signal and/or WhatsApp, was deleted by an auto-delete setting.

Retention

54. Admit that You have not retained all Communications Regarding Litigation Relating to Baby Doe that You sent or received using the jkmast@liberty.edu address.

55. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the jkmast@liberty.edu address.

56. Admit that, on or after September 2, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the jkmast@liberty.edu address.

57. Admit that, at any point since December 8, 2021, Your jkmast@liberty.edu account was set to auto-delete Communications sent or received by You.

58. Admit that, between December 8, 2021 and September 1, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the jkmast@liberty.edu address, was deleted by an auto-delete setting.

59. Admit that, on or after September 2, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the jkmast@liberty.edu address, was deleted by an auto-delete setting.

60. Admit that You have not retained all Communications Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@socom.mil address.

61. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@socom.mil address.

62. Admit that, on or after September 2, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@socom.mil address.

63. Admit that, between December 8, 2021 and September 1, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@socom.mil address, was deleted by an auto-delete setting.

64. Admit that, on or after September 2, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@socom.mil address, was deleted by an auto-delete setting.

65. Admit that You have not retained all Communications Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.mil address.

66. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.mil address.

67. Admit that, on or after September 2, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.mil address.

68. Admit that, between December 8, 2021 and September 1, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.mil address, was deleted by an auto-delete setting.

69. Admit that, on or after September 2, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.mil address, was deleted by an auto-delete setting.

70. Admit that You have not retained all Communications Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.smil.mil address.

71. Admit that, between December 8, 2021 and September 1, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.smil.mil address.

72. Admit that, on or after September 2, 2022, You deleted at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.smil.mil address.

73. Admit that, between December 8, 2021 and September 1, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.smil.mil address, was deleted by an auto-delete setting.

74. Admit that, on or after September 2, 2022, at least one Communication Regarding Litigation Relating to Baby Doe that You sent or received using the Joshua.k.mast1.mil@mail.smil.mil address, was deleted by an auto-delete setting.

Additional RFAs

75. Admit that Exhibit A, attached hereto, is a true and accurate copy of the redacted version of the Verified Complaint and Petition for a Temporary Restraining Order filed on Your behalf by Richard Mast in the matter styled *"Baby L." a minor, by and through her legal guardians and next friends, DOE 1 and DOE 2, DOE 1, individually and as next friend of "Baby L." and DOE 2, individually and as next friend of "Baby L."*, Civil Action No. 3:20-cv-00009-NKM (the "Verified Complaint").

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76. Admit that references to "Baby L." in the Verified Complaint are references to the same child identified in the instant action as "Baby Doe."

77. Admit that references to "DOE 1" in the Verified Complaint are references to Joshua Mast.

78. Admit that references to "DOE 2" in the Verified Complaint are references to Stephanie Mast.

79. Admit that You executed the following VERIFICATION appearing on page 23 of the Verified Complaint: "I declare under penalty of perjury that the factual allegations contained in the foregoing Verified Complaint are true and correct."

80. Admit that a true and correct copy of an October 25, 2019 email You sent to Defendant Kimberley Motley is attached as Exhibit B.

Dated: January 18, 2024   Respectfully submitted,

                                      /s/ *Maya Eckstein*
                                      Maya M. Eckstein (VSB No. 41413)
                                      Lewis F. Powell III (VSB No. 18266)
                                      Kevin S. Elliker (VSB No. 87498)
                                      HUNTON ANDREWS KURTH LLP
                                      951 E Byrd St
                                      Richmond, VA 23219
                                      Telephone: (804) 788-8200
                                      Fax: (804) 788-8218
                                      Email: meckstein@HuntonAK.com
                                      Email: lpowell@HuntonAK.com
                                      Email: kelliker@HuntonAK.com

                                      Jeremy C. King (*admitted pro hac vice*)
                                      HUNTON ANDREWS KURTH LLP
                                      200 Park Avenue
                                      New York, NY 10166
                                      Telephone: (212) 309-1000
                                      Fax: (212) 309-1100
                                      Email: jking@HuntonAK.com

                                      Sehla Ashai (*admitted pro hac vice*)
                                      ELBIALLY LAW, PLLC
                                      704 East 15th Street
                                      Suite 204
                                      Plano, TX 75074

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Telephone: (312) 659-0154
Email: ashai@elbiallylaw.com

Blair Connelly (*admitted pro hac vice*)
Zachary Rowen (*admitted pro hac vice*)
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10029
Telephone: (212) 906-1200
Email: blair.connelly@lw.com
Email: Zachary.rowen@lw.com

Damon Porter (*admitted pro hac vice*)
Ehson Kashfipour (*admitted pro hac vice*)
LATHAM & WATKINS LLP
555 Eleventh Street, NW, Suite 1000
Washington, DC 20004-1304
Telephone: (202) 637-2001
Email: damon.porter@lw.com
Email: ehson.kashfipour@lw.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2024, I electronically mailed the foregoing

to all counsel of record in this case.

Dated: January 18, 2024   Respectfully submitted,

/s/ *Maya Eckstein*
Maya M. Eckstein (VSB No. 41413)
Lewis F. Powell III (VSB No. 18266)
Kevin S. Elliker (VSB No. 87498)
HUNTON ANDREWS KURTH LLP
951 E Byrd St
Richmond, VA 23219
Telephone: (804) 788-8200
Fax: (804) 788-8218
Email: meckstein@HuntonAK.com
Email: lpowell@HuntonAK.com